

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**OPPOSITION TO THIRD PARTY DEBBIE RIDDLE'S ORIGINAL MOTION TO
QUASH THE SUBPOENA FOR DEPOSITION**

Plaintiffs Texas NAACP and MALC have subpoenaed Representative Debbie Riddle for her deposition. Representative Riddle played a unique role in the legislative proceedings leading up to the enactment of SB 14. She was deposed in the Section 5 litigation, during which time she invoked legislative privilege to numerous questions posed by the Defendant and Defendant-Intervenors in that case. The Department of Justice has fully briefed the reasons why this deposition should go forward in the United States' Opposition to Texas Legislators' Motions to Quash Deposition Subpoenas (ECF 309), which briefing Plaintiffs incorporate herein by reference.

Without burdening this Court with additional argument, for the reasons set forth in the submission of the United States, Plaintiffs respectfully request that this Court deny Representative Riddle's motion to quash.

Dated: June 5, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document is being served by electronic mail on June 5, 2014, to all counsel of record.

/s Michelle Hart Yeary
Michelle Hart Yeary